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October 16, 2017

Letter in Lieu of Motion

Re: Response to Courts order re: Curcio

1. I first met Ms. Baranova at the status hearing. I was covering for my old law firm. Ms. Baranova approached me and told me that Mr. Shulaya wanted to hire me. I agreed to speak with him.
2. My understanding is that they are friends and as I sit here today I don't know anything different. I did ask her if they were an intimate or deeply close friendship. She said no. I didn't think anything of their friendship. She said she had no involvement in case. I still don't know what her involvement in this case.
3. She also told me she was an interpreter and had majored in linguistics in school. Based on that after, hearing I went to marshal's office and she interpreted for me. I never left them alone in there or at anytime at MDC except when I used the bathroom. I stayed there on average 4 to 6 hours reviewing transcripts with him.
4. She showed me an ATA translator certificate which I believe she attached to her application to interpret.
5. As a paralegal, she just accompanied me to the jail and review transcripts that are all in English and translated what was on them and his response to me. She did not have access to any other

discovery or ever come to my office she just met me at jail and kept the transcripts organized.

6. She has never been tasked with anything but organizing the transcripts I printed out. I did on occasion ask her to write down anything I thought that was pertinent in transcript not the words but the page and document number so I could refer to it later.
7. When I represented she worked for me I told Your Honor in open court my client hired her to work for me on this case. In court, when Musa Obregon withdrew. When I say she works for me, she was hired by my client to work for me on this case. I told the court that.
8. The hours she has worked as a paralegal are same as interpreter
9. I would not know how she was paid. I never gave her any money. I assumed that she was paid by him.

Your Honor the court ordered she could only come in with me, I found out she had gone in with another attorney after I filed my motion to withdraw. I called MDC and let them know that she was supposed to only enter there only with me or my representative and I had filed a motion to withdraw. I spoke to Asia Cruz there and she immediately removed her from the list.

Your Honor, my client has provided no other funds to fight this case and the court is aware of my motions to withdraw. I cannot prepare for a trial when I have no ability to hire interpreters, paralegals, attorneys or any other necessary professionals to fight such a huge case. The only help I was provided was Ms. Baranova and I never saw them attempt to do anything inappropriate while she worked with me. This why I requested CJA funds to assist me on this case. I had no access to anyone else to speak Russian.

If there is any other questions the court has, Ill be happy to provide more detail. I do not have a copy of the transcript but I have sen It and I believe it was attached to her application

/s/C.Burell Shella

C. Burell Shella